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**United States Department of Energy**

**Savannah River Site**

**Explanation of Significant Difference (ESD) to the  
Revision 1 Record of Decision for the Burma Road Rubble  
Pit, 231-4F (U)**

**WSRC-RP-98-4170**

**Revision 1**

**March 1999**

**Prepared by:  
Westinghouse Savannah River Company LLC  
Savannah River Company  
Aiken, SC 29808**

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## Introduction

This Explanation of Significant Difference (ESD) is being issued by the U.S. Department of Energy (US DOE), the lead agency for the Savannah River Site (SRS) remedial activities, with concurrence by the U.S. Environmental Protection Agency (US EPA) – Region IV and the South Carolina Department of Health and Environmental Control (SCDHEC). The purpose of this ESD is to announce changes in the remedial decision selected for the Burma Road Rubble Pit (BRRP) waste unit. The BRRP is located northwest of the center of SRS (Figure 1) in Aiken, South Carolina.

The remedy selected in the BRRP Record of Decision (ROD) is No Action because the unit poses no significant risks to human health or the environment. However, the ROD Declaration also stated that SRS would place a notation on the deed in the county records stating that inert debris was buried at the BRRP and that SRS will file a certified survey plat of the BRRP with the notification. These two items are institutional-like controls. This ESD provides the rationale for changing the remedy to a pure No Action remedy and eliminating the deed notification and survey plat. This modification will have no adverse impact on human health or the environment, provide a minor cost savings, eliminate a contradiction within the BRRP ROD and align the BRRP no action remedial decision with all other SRS No Action remedy RODs.

SRS is required under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) Section 117 (c) to

publish an ESD whenever there is a significant change to a component of a remedy specified in a ROD. Section 300.345 (c)(2)(I) of the National Oil and Hazardous Substances Pollution Contingency Plan (NCP) requires the lead agency to provide an explanation of the differences and to make this information available to the public in the Administrative Record File and information repositories. This ESD is available for public review during normal business hours at the following information repositories:

U.S. Department of Energy  
Public Reading Room  
Gregg-Graniteville Library  
University of South Carolina Aiken  
171 University Parkway  
Aiken, SC 29801  
(803) 641-3465

Thomas Cooper Library  
Government Documents Department  
University of South Carolina  
Columbia, SC 29208  
(803) 777-4866

## Summary of Site History, Contamination Problems, and Selected Remedy

The BRRP was used from 1973 to 1983 for the disposal of dry inert rubble such as wood, trash, wire, bottles, plastic, construction rubble, concrete, etc. There are no records of hazardous substances or wastes being disposed of at the BRRP. Disposal activities ceased in 1983 and the pits were backfilled with native soil.

The BRRP consists of two unlined earthen pits dug into surficial soil. The pits were originally reported to be 485 feet long, 125 to 150-feet wide and at least 10-feet deep. A ground-penetrating radar survey conducted in September

1988 indicated that the BRRP area consists of two generally rectangular pits, each about 400-feet long, 50-feet wide (maximum width) and 10-feet deep.

A Resource Conservation and Recovery Act Facility Investigation/Remedial Investigation (RFI/RI) was conducted from November 1993 to February 1994. The investigation addressed the rubble (potential source), the shallow and deep soils, and the groundwater. The investigation concluded that there was no contamination at, or leaching from, the BRRP. However, it was noted that contaminants from an upgradient source, not the BRRP, were detected in the groundwater. The groundwater is being addressed with the upgradient source. The investigation and risk assessment concluded that the BRRP posed no significant risk to human health or the environment and that historical documents are correct in stating that only nonhazardous inert material was disposed of at the BRRP.

Groundwater contamination found beneath the BRRP is due to migration from upgradient sources in F-Area such as the F-Area Inactive Process Sewer Lines and was not addressed by the BRRP remedial action. Following an investigation on upgradient groundwater contaminant sources, a determination will be made as to what corrective action might be appropriate for the groundwater.

As stated above, the risk assessment concluded that the BRRP posed no unacceptable risk to human health or the environment (both current and future scenarios). The remedy, as stated in the Declaration for the Revision.1 ROD (WSRC-

RP-96-101, April 1996), consisted of (1) No Action; (2) a notation identifying the presence of buried inert debris on the deed to be filed in the Aiken County Records; (3) prepare and file a certified survey plat of the area, and; (4) no Five-Year Review(s) of the ROD will be conducted.

#### **Description of Significant Differences and the Basis for those Differences**

Under the proposed change to the originally approved remedy, the deed notification and survey plat will not be filed as specified in the ROD. Instead, SRS will initiate and complete the CERCLA 120(h) evaluation if and when the land is ever transferred to a non-Federal entity. The reasons for the change are listed below:

1. The unit poses no threat to human health or the environment and No Action is the selected remedy. Institutional controls are not needed to protect the environment, workers or future residents from the BRRP, nor are institutional-like controls necessary to identify buried inert debris. A No Action remedy means unrestricted access for current and future land uses.
2. As a federally-owned facility, DOE (SRS) must comply with CERCLA 120 (h). CERCLA 120 (h) states that when and if a federal agency transfers land to a non-federal entity, they must make a full disclosure on the deed of waste management, remediation, investigation, etc., activities that occurred or are on-going. At the time of transfer, the evaluation will include a determination that there is no need

for any land use restriction at the BBRP, as originally concluded by the remedy selection process. Any decisions to alter the need for land use restrictions will be made by the Three Parties to the FFA. The need for groundwater use restrictions will be evaluated during the investigation and remedy selection process for the groundwater.

3. The Declaration states that we will perform the deed notification while the description of the preferred alternative (Section VII) states that "no treatment will be performed, no new institutional or engineering controls will be implemented, and no cost is associated with implementing this alternative." The alternative description is not consistent with the Declaration. This ESD will correct the inconsistency within the ROD.

It was estimated that it would cost approximately \$8000.00 to perform the deed notification specified in the ROD. This included performing a survey by a certified surveyor, development of the plat and notice and submitting the plat to the appropriate county agency. The ROD incorrectly stated that there was no cost associated with the selected remedy. Clarification of the selected "No Action" remedy by this ESD would eliminate the above costs.

Initiating the changes outlined in this ESD will not reduce the overall effectiveness or protection of human health or the environment provided by the No Action remedy outlined in the April 1996 ROD. Rather, the selected change will provide

the same effectiveness as the original remedy; it will eliminate the cost to file the deed notification, clarify an inconsistency in the ROD and make the BRRP remedy consistent with other SRS no action remedies.

#### **Support Agency Comments**

Comments will be incorporated upon receipt.

#### **Public Participation Activities**

The public will be informed of the changes to the selected remedy as specified in this document through public notices in the *Barnwell People Sentinel*, *Allendale Citizen Leader*, *Aiken Standard*, *Augusta Chronicle* and *The State*.

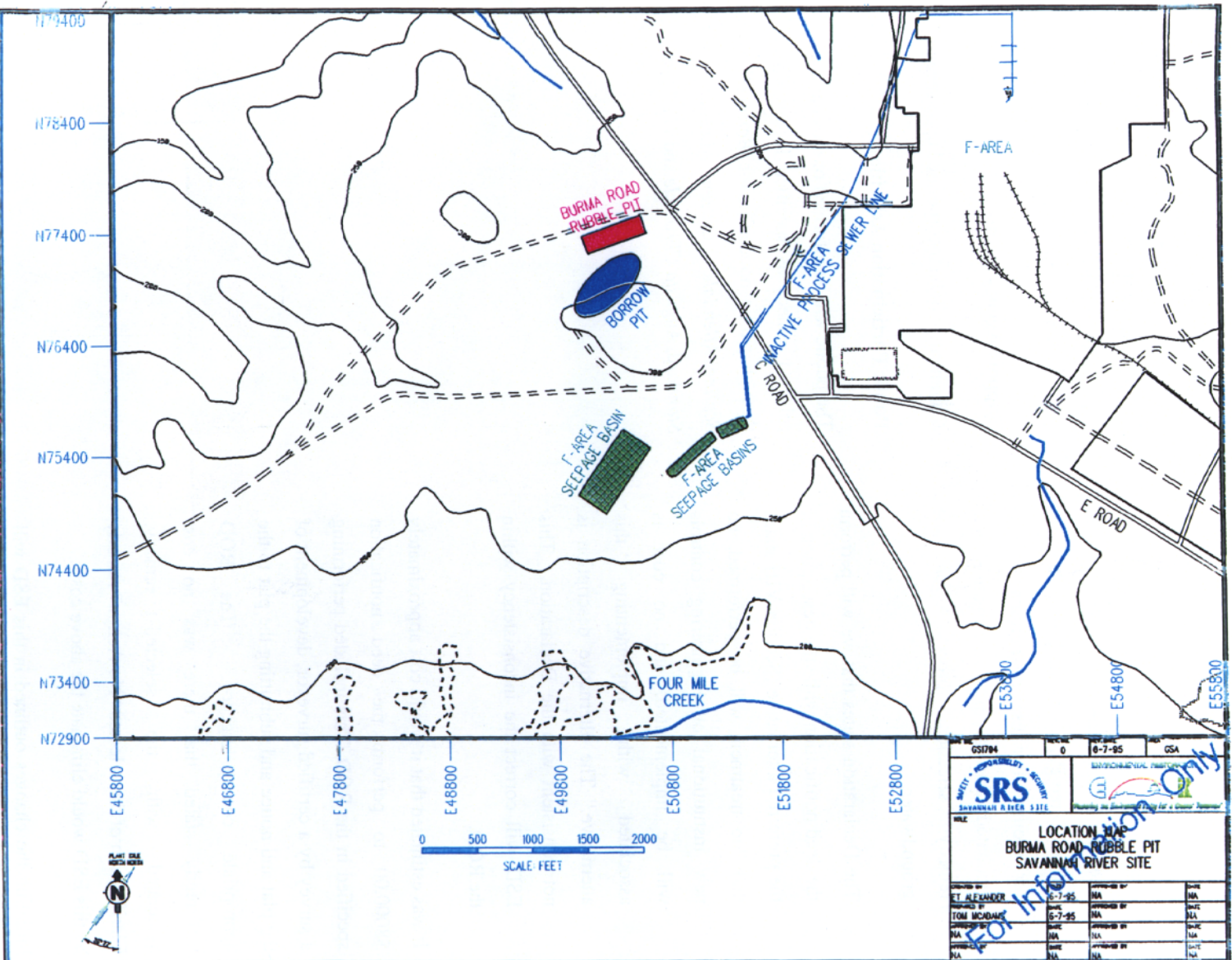


Figure 1. Location of the Burma Road Rubble Pit at the Savannah River Site

8/22/00

Date

*Thomas F. Heenan*

Thomas F. Heenan  
Assistant Manager for Environmental Programs  
U.S. Department of Energy, Savannah River Operations Office

12/5/00

Date

*Robert D. Green*

Richard D. Green  
Division Director  
Waste Management Division  
U.S. Environmental Protection Agency – Region IV

2/1/01

Date

*R. Lewis Shaw*

R. Lewis Shaw  
Deputy Commissioner  
Environmental Quality Control  
South Carolina Department of Health and Environmental Control

